

### **REMARKS**

The Advisory Action of January 23, 2006 has been received and its contents carefully analyzed. By this amendment, claims 1, 8, and 12 have been amended and new claims 23 and 24 have been added. Accordingly, claims 1-3, 5-20, and 23-24 are currently pending in the application, of which claims 1 and 12 are independent claims. Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification.

Applicants appreciate the Examiner's remarks provided in the Advisory Action of January 23, 2006 and the Final Office Action of August 22, 2005.

In view of the above amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

#### ***Allowable Subject Matter***

Applicants appreciate the indication that claim 8 is allowable.

#### ***Rejections Under 35 U.S.C. § 103***

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the reference or references, when combined, must disclose or suggest all of the claim limitations. The motivation to modify the prior art and the reasonable expectation of success must both be found in the prior art and not based upon a patent applicant's disclosure. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

***Shimo, et. al. (Japanese Patent Publication No. 08-222371)***

Claims 1-3, 5-6, 9-15, and 19-22 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Japanese Patent Publication No. 08-222371 issued to Shimo, *et al.* ("Shimo"). Applicants respectfully traverse this rejection for at least the following reasons.

Independent claim 1, as presently amended, includes the limitations of claim 8, which have been indicated as allowable subject matter by the Examiner in the Final Office Action mailed August 22, 2005, and recites:

"A method for structuring a homogeneous electrode for an organic light-emitting display, wherein the laser beam is a pulse laser with a pulse duration of 20 ns or less and the homogeneous electrode is coated with a material comprising graphite for facilitating absorption of the laser beam prior to the ablation."

Similarly, independent claim 12, as presently amended, also includes the limitations of claim 8 and recites:

"An apparatus for structuring a homogeneous electrode for an organic light-emitting display using ablation of a laser beam to form periodic electrode structures, wherein the laser beam is a pulse laser with a pulse duration of 20 ns or less and the homogeneous electrode is coated with a material comprising graphite for facilitating absorption of the laser beam prior to the ablation."

Shimo fails to teach or suggest each and every claimed feature of amended claims 1 and 12. As stated by the Examiner, in the Final Office Action mailed August 22, 2005, the prior art fails to suggest coating an electrode with graphite for facilitating absorption of the laser beam prior to ablation. The prior art neither suggests a direct ablation of the metal electrode layer, or use of alternate materials, such as silver for promoting anti-reflection or absorption of the laser beam. Although it is further known in the art that graphite is absorptive of ultraviolet light, there is no suggestion in the prior art that such a layer is usable for coating a metal electrode layer to promote ablation, nor is there any suggestion that graphite would be compatible or viable material with an OLED structure, OLED manufacturing processes, or laser ablation of metal

electrodes in general. Hence, it is the Examiner's opinion that a person having ordinary skill in the art would have found no motivation to use graphite as a metal electrode coating layer in an OLED fabrication process (See Final Office Action, mailed August 22, 2005, pages 6 and 7, paragraph 6). Claims 2-3, 5-6, 9-11, 13-15, and 19-20 depend from amended claims 1 and 12 and therefore are patentable for at least the reasons discussed above.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1-3, 5-6, 9-15, and 19-20. Claims 21 and 22 have been cancelled. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 12, as amended, and claims 2-3, 5-6, 9-11, 13-15, and 19-20 that depend therefrom, are allowable.

***Shimo, et. al. (Japanese Patent Publication No. 08-222371) in view of Dubowski, et. al. (U.S. Patent No. 6,719,916).***

Claim 7 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Shimo in view of U.S. Patent No. 6,719,916, issued to Dubowski, et. al. ("Dubowski"). Applicants respectfully traverse this rejection for at least the following reasons.

As noted above, Shimo fails to disclose or suggest each and every claimed feature of amended claim 1. Claim 7 depends from amended claim 1 and therefore is patentable for at least the reasons discussed above.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claim 7. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that claim 7 is allowable.

***Shimo, et. al. (Japanese Patent Publication No. 08-222371) in view of Dubowski, et. al. (U.S. Patent No. 6,576,867).***

Claim 16-18 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Shimo in view of U.S. Patent No. 6,576,867, issued to Lu, *et. al.* ("Lu"). Applicants respectfully traverse this rejection for at least the following reasons.

As noted above, Shimo fails to disclose or suggest each and every claimed feature of amended claim 12. Claims 16-18 depend from amended claim 12 and therefore are patentable for at least the reasons discussed above.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 16-18. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that claims 16-18 are allowable.

***New Claims 23 and 24***

New claims 23 and 24 have been added to include the limitations previously recited in dependent claims 21 and 22 for which the subject matter was incorporated into independent claims 1 and 12 in the Reply and Amendment under 37 C.F.R. §1.116 filed by Applicants on December 19, 2005. New claims 23 and 24 depend from amended claims 1 and 12 and therefore are patentable for at least the reasons discussed above. Accordingly, Applicants respectfully believe that new claims 23 and 24 are in condition for allowance.


**CONCLUSIONS**

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



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